

# TSD File Inventory Index

Date: October 22, 2009

Initial: CMH/enevas

Facility Name: <u>Victor Envelope Manufacturing/Corporation (One Field Site)</u>			
Facility Identification Number: <u>160947 069 104</u>			
<b>A.1 General Correspondence</b>		<b>B.2 Permit Docket (B.1.2)</b>	
<b>A.2 Part A / Interim Status</b>		<b>.1 Correspondence</b>	
<b>.1 Correspondence</b>	X	<b>.2 All Other Permitting Documents (Not Part of the ARA)</b>	
<b>.2 Notification and Acknowledgment</b>	X	<b>C.1 Compliance - (Inspection Reports)</b>	X
<b>.3 Part A Application and Amendments</b>		<b>C.2 Compliance/Enforcement</b>	X
<b>.4 Financial Insurance (Sudden, Non Sudden)</b>		<b>.1 Land Disposal Restriction Notifications</b>	
<b>.5 Change Under Interim Status Requests</b>		<b>.2 Import/Export Notifications</b>	
<b>.6 Annual and Biennial Reports</b>		<b>C.3 FOIA Exemptions - Non-Releasable Documents</b>	
<b>A.3 Groundwater Monitoring</b>		<b>D.1 Corrective Action/Facility Assessment</b>	X
<b>.1 Correspondence</b>		<b>.1 RFA Correspondence</b>	X
<b>.2 Reports</b>		<b>.2 Background Reports, Supporting Docs and Studies</b>	
<b>A.4 Closure/Post Closure</b>	X	<b>.3 State Prelim. Investigation Memos</b>	
<b>.1 Correspondence</b>	X	<b>.4 RFA Reports</b>	X
<b>.2 Closure/Post Closure Plans, Certificates, etc</b>		<b>D. 2 Corrective Action/Facility Investigation</b>	X
<b>A.5 Ambient Air Monitoring</b>		<b>.1 RFI Correspondence</b>	
<b>.1 Correspondence</b>		<b>.2 RFI Workplan</b>	
<b>.2 Reports</b>		<b>.3 RFI Program Reports and Oversight</b>	
<b>B.1 Administrative Record</b>		<b>.4 RFI Draft /Final Report</b>	
		<b>5. RFI QAPP</b>	

Total - 1

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
7			

Note: Transmittal Letter to Be Included with Reports.

Comments: *See field notes*



Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).



ID — For Official Use Only															
C														T/A	C
W															1

# X. Description of Hazardous Wastes (continued from front)

**A. Hazardous Wastes from Nonspecific Sources.** Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1 F001	2	3	4	5	6
7	8	9	10	11	12

**B. Hazardous Wastes from Specific Sources.** Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. Commercial Chemical Product Hazardous Wastes.** Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

**D. Listed Infectious Wastes.** Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

**E. Characteristics of Nonlisted Hazardous Wastes.** Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☒ 1. Ignitable  
(D001)

☐ 2. Corrosive  
(D002)

☐ 3. Reactive  
(D003)

☐ 4. Toxic  
(D000)

# XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature 	Name and Official Title (type or print) PRINT. WALTER GROSS SUPERVISOR	Date Signed 2/19/86
--	---	------------------------



**ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

•IL0047019104

INSTALLATION ADDRESS

VICTOR ENVELOPE MFG CORP INC  
934 CHURCH RD  
ELMHURST

IL 60126

934 CHURCH RD  
ELMHURST

IL 60126

M 3/21/86





217/782-6762

Refer to: 0430355026 -- DuPage County  
Victor Envelope Manufacturing  
Closure Plan Approved: January 13, 1989 Log #C-459  
ILD047019104  
RCRA-Closure

August 28, 1989

File

Mr. Kenneth R. Seroka  
Victor Envelope Manufacturing Company  
934 Church Road  
Elmhurst, Illinois 60126

Dear Mr. Seroka:

The subject hazardous waste management facility was inspected by a representative of this Agency on July 18, 1989. The inspection revealed that the closure activity was completed in accordance with the approved closure plan dated January 13, 1989.

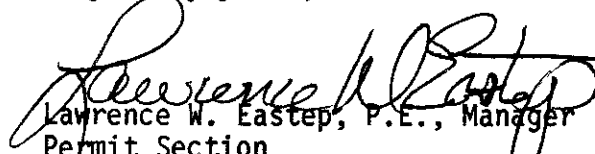
Certification that the hazardous waste container storage (S01) areas (i.e. Area #1 and Area #2) had been closed in accordance with the approved closure plan by the owner/operator, yourself, and an independent registered professional engineer, James J. McGuigan, of Illinois was received at this Agency June 28, 1989.

The Agency has determined that the closure of the container storage areas has apparently met the requirements of Interim Status Standards, 35 Ill. Admin. Code, Part 725 (40 CFR, Part 265).

This facility must continue to meet the requirements of 35 IAC Section 722 - Standards Applicable to Generators of Hazardous Waste.

If you have any questions, please contact Karen Nachtwey at 217/782-0892.

Very truly yours,


  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:KEN:rlc/2753k,70

cc: Maywood Region  
USEPA Region V, Mary Murphy  
USEPA Region V, Art Kawatachi  
James J. McGuigan, P.E.  
Division File  
Andy Vollmer  
Compliance Section



*George Hanger*

NP  Illinois Environmental Protection Agency

P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Log No. C-459

Received: October 31, 1988

Refer to: 0430355026 --DuPage County  
Elmhurst/Victor Envelope Mfg. Corp.  
ILD047019104  
RCRA-Closure

January 13, 1989

Victor Envelope Mfg. Corp.  
Attn: Kenneth R. Seroka  
934 Church Road  
Elmhurst, Illinois 60126

Dear Mr. Seroka:

The closure plan submitted by yourself has been reviewed by this Agency. Your final closure plan to close the two hazardous waste container (S01) storage areas is hereby approved subject to the following conditions.

1. Closure activities must be completed by August 1, 1989. When closure is complete the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan. This certification must be received at this Agency within 60 days after closure, or by October 1, 1989.

The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Agency approves the facility's closure certification.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E. The closure plan must include a statement acknowledging this requirement.

RECEIVED  
JAN 18 1989  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V



Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, sec. 13.1 of the Illinois Professional Engineering Act.

As part of the closure certification, to document the closure activities at your facility, please submit a Closure Documentation Report which includes:

- a. The volume of waste and waste residue removed. The term waste includes wastes resulting from decontamination activities.
- b. A description of the method of waste handling and transport.
- c. The waste manifest numbers.
- d. Copies of the waste manifests.
- e. A description of the sampling and analytical methods used.
- f. A chronological summary of closure activities and the cost involved.
- g. Color photo documentation of closure. Document conditions before, during and after closure.
- h. Tests performed, methods and results.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency  
Division of Land Pollution Control -- #24  
Permit Section  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

2. If the Agency determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code, Section 725.211, the Agency reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.
3. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health



Page 3

and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

4. The concrete surfaces shall be visually inspected, photographed and any residue adhering to the surface must be removed by scraping and/or brushing. Following this, the concrete surfaces must be steam cleaned and triple rinsed. All wash and rinse water shall be collected. If analysis of the wash or rinse water samples detect the presence of F001, or F005 then that material must be managed as a hazardous waste. If the wash or rinse water samples exhibit a characteristic of hazardous waste then that material must be managed as a hazardous waste. In any event the material must be managed as a special waste. If, after cleaning the concrete surfaces, any cracks, joints or other defects are found that would allow waste to migrate through the concrete into the underlying soil, a closure plan modification request addressing soil sampling at those locations must be submitted to this Agency within sixty (60) days of such a finding.
5. 35 IAC 721.131 F001 through F005 wastes must be disposed in accordance with 35 IAC Part 728.

Should you have any questions regarding this matter, please contact Eugene W. Dingledine at 217/782-5504.

Very truly yours,

*Lawrence W Eastep bks*

Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:EWD:bls/0131k,33,35

Attachment

cc: Northern Region  
Division File - RCRA Closure  
Andy Vollmer  
, P.E.  
USEPA Region V -- George Hamper  
USEPA Region V -- Mary Murphy  
Compliance Section





ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

Closure Log C-459

The two hazardous waste management S01, units at the facility described in this document have been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

\_\_\_\_\_  
USEPA ID Number

\_\_\_\_\_  
Facility Name

\_\_\_\_\_  
Signature of Owner/Operator

\_\_\_\_\_  
Name and Title

\_\_\_\_\_  
Signature of Registered P.E.

\_\_\_\_\_  
Name of Registered P.E. and Illinois  
Registration Number

\_\_\_\_\_  
Date

EWD:b1s/0131k,36





# Victor Envelope Mfg. Corp.

934 CHURCH ROAD  
ELMHURST, ILLINOIS 60126

October 26, 1988

Paul E. Dimock, Chief  
IL/WI/MI Enforcement Program Section  
United States Environmental Protection Agency  
Region 5  
230 South Dearborn Street  
Chicago, Illinois 60604

RECEIVED  
OCT 31 1988  
OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

REPLY TO 5HR-12 VICTOR ENVELOPE COMPANY **ILD 047-019-104**

Dear Mr. Dimock:

In response to your letter dated September 29, 1988, the following actions have been taken to rectify our waste violations and to assure future compliance.

1. Enclosed please find a copy of a letter sent to Illinois EPA dated October 13, 1988. This letter explains how Victor Envelope now determines treatability groups and the associated treatment standards.
2. The waste that was on site during the July 14, 1988 RCRA inspection has been removed by Avganic Industries, Inc. Copies of the manifests and attached notices are enclosed for your perusal.
3. Any and all containers entering storage now have dates when entered and contents identified.
4. Recycling programs have been set up with Avganic Ind., Inc. and Safety-Kleen Corporation to minimize the accumulation of wastes.
5. Eldrege Engineering Associates, Inc. located in Naperville, Illinois has been retained by Victor Envelope Company to act as a consultant to help with the handling of our wastes.

While we regret the violations occurred, we feel that with the help of Avganic Ind., Safety-Kleen, and Eldrege Engineering, we can assure you future compliance. If you have any questions, please contact me at any time.

Sincerely,



Kenneth R. Seroka  
Vice President-Operations

KRS:mlr

# Victor Envelope Mfg. Corp.

934 CHURCH ROAD  
ELMHURST, ILLINOIS 60126

October 13, 1988

Angela Aye Tin, Manager  
Technical Compliance Unit  
Compliance Section  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

REFER TO: 0430355026 - DuPage  
ILD047019104


Dear Ms. Tin:

Since the July 14, 1988 RCRA inspection at the above referenced site, we have adopted the following procedure to determine whether a waste is hazardous or non-hazardous.

- Step 1: Check for an exclusion from regulation under section 721.104.
- Step 2: Determine if the waste is listed as a hazardous waste in subpart D of part 721.
- Step 3: If the waste is not listed as a hazardous waste in subpart D of part 721, determine whether the waste is identifiable in subpart C of part 721 by either :
  - a. Testing the waste according to the methods set forth in subpart C of part 721. Such testing will be provided by Avganic Industries Cottage Grove, Wisconsin
  - b. Applying knowledge of the Hazard characteristic of the waste in light of the materials or processes used.

We hope that this procedure meets with your approval. If I can be of further assistance, please contact me.

Sincerely,



Kenneth R. Seroka  
Vice-President - Operations

KRS:mlr



STATE OF WISCONSIN  
Chapter 144, Wis. Stats.  
Form 4400-66

Rev. 7-87

State of Wisconsin  
Department of Natural Resources  
Bureau of Solid Waste Mgt.  
Box 8094  
Madison, Wisconsin 53708

FOR DNR USE ONLY

Please print or type. Form designed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILD047019104	Manifest Document No. 17093	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Victor Envelope Mfg. 934 Church Rd. 312 234 Elmhurst IL 60126			A. State Manifest Document Number WI G 07092		B. State Generator's ID	
4. Generator's Phone		6. US EPA ID Number WID000808824		C. State Transporter's ID 2086		D. Transporter's Phone 608-257-1414
5. Transporter 1 Company Name Avganic Industries, Inc.		8. US EPA ID Number		E. State Transporter's ID		F. Transporter's Phone
7. Transporter 2 Company Name		10. US EPA ID Number WID000808824		G. State Facility's ID		H. Facility's Phone (608) 257-1414
9. Designated Facility Name and Site Address Avganic Industries, Inc. 114 N. Main St. Cottage Grove, WI 53527		12. Containers No. Type		13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		a. Waste Combustible Liquid NOS, Combustible Liquid NA1993		9 DM	4959	0001
b. Waste Combustible Liquid NOS, Combustible Liquid NA1993		2 DM		1109	F001	
c.						
d.						
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information 11a) 9674-R-16466 11b) 9634-R-16465						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;  OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name & Position Title David Nickell Plant Engineer		Signature [Signature]		Date Month Day Year 10/1/88		
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name & Position Title MIKE SWADER DRIVER		Signature [Signature]		Date Month Day Year 10/1/88		
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name & Position Title		Signature		Date Month Day Year		
19. Discrepancy Indication Space						
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name & Position Title		Signature		Date Month Day Year		

FPA Form 8700-22 (Rev. 9-86) Previous editions are obsolete.

Copies 1 & 3 mail to Wis. DNR at above address.

COPY 2—  
GENERATOR RETAIN

Emergency 24 Hour Assistance Telephone Number  
In Wisconsin (608) 266-3232  
Outside Wisconsin (800) 424-8802

COPY 2—  
GENERATOR RETAIN

# NOTIFICATION OF TREATMENT REQUIREMENTS FOR LAND DISPOSAL RESTRICTED WASTE STREAMS

Company Victor Envelope Mfg Address 934 Church Rd. Elmhurst, IL  
 U.S. EPA ID # ILD04709104 Manifest # WIG 07092

This serves as notification that the above-referenced waste stream is affected by the U.S. EPA Land Disposal Restrictions set forth in 40 CFR 268. The following indicated substances and treatment standards are those applicable to this waste stream.

U.S. EPA Waste Code Numbers

☒ F001 ☐ F002 ☐ F003 ☐ F005

## TREATMENT STANDARDS FOR SPENT SOLVENT WASTES

Waste Waters  
Containing  
Spent Solvents  
Concentration mg/L

All Other  
Spent Solvent  
Waters  
Concentration mg/L

F001 - F005 Spent Solvents

<input checked="" type="checkbox"/> Acetone	0.05	0.59
<input type="checkbox"/> n-Butyl alcohol	5.0	5.0
<input type="checkbox"/> Carbon disulfide	1.05	4.81
<input type="checkbox"/> Carbon tetrachloride	.05	.96
<input type="checkbox"/> Chlorobenzene	.15	.05
<input type="checkbox"/> Cresols (and Cresylic acid)	2.82	.75
<input type="checkbox"/> Cyclohexanone	.125	.75
<input type="checkbox"/> 1,2-Dichlorobenzene	.65	.125
<input type="checkbox"/> Ethylacetate	.05	.75
<input type="checkbox"/> Ethyl benzene	.05	.053
<input type="checkbox"/> Ethyl ether	.05	.75
<input type="checkbox"/> Isobutanol	5.0	5.0
<input type="checkbox"/> Methanol	.25	.75
<input type="checkbox"/> Methylene chloride	.20	.96
<input type="checkbox"/> Methylene chloride (from the pharmaceutical industry)	12.7	.96
<input type="checkbox"/> Methyl ethyl ketone	0.05	0.75
<input type="checkbox"/> Methyl isobutyl ketone	0.05	0.33
<input type="checkbox"/> Nitrobenzene	0.66	0.125
<input type="checkbox"/> Pyridine	1.12	0.33
<input type="checkbox"/> Tetrachloroethylene	0.079	0.05
<input type="checkbox"/> Toluene	1.12	0.33
<input type="checkbox"/> 1,1,1-Trichloroethane	1.05	.41
<input type="checkbox"/> 1,2,3-Trichloro	1.05	0.96
<input type="checkbox"/> -1,2,2-trifluoroethane		
<input type="checkbox"/> Trichloroethylene	0.062	0.091
<input type="checkbox"/> Trichlorofluoromethane	0.05	0.96
<input type="checkbox"/> Xylene	0.05	0.15

## TREATMENT STANDARDS FOR CALIFORNIA LIST CONSTITUENTS

Constituent	Concentration (mg/L)
<input type="checkbox"/> Cyanides	1000
<input type="checkbox"/> Arsenic	500
<input type="checkbox"/> Cadmium	100
<input type="checkbox"/> Chromium VI	500
<input type="checkbox"/> Lead	500
<input type="checkbox"/> Mercury	20
<input type="checkbox"/> Nickel	134
<input type="checkbox"/> Selenium	100
<input type="checkbox"/> Thallium	130
<input type="checkbox"/> Liquids with pH $\leq$ 2.0	---
<input type="checkbox"/> Liquids with PCB's	50 ppm
<input type="checkbox"/> Wastes containing HOC's*	
- Liquid containing HOC's	1000 mg/L
- Solid containing HOC's	1000 mg/kg

\* Halogenated organic compounds

\*\* Cyanide and metal concentrations subject to change with issuance of final regulation. See 52 FR 29992, August 12, 1987

The above information is based upon ( ) an attached waste analysis or (X) generator knowledge of the waste stream(s).

## GENERATOR INFORMATION

Signed David Mickell Printed Name David Mickell  
 Title Plant Engineer Date 10-11-88





STATE OF WISCONSIN  
Chapter 144, Wis. Stats.  
Form 4400-66

Rev. 7-87

State of Wisconsin  
Department of Natural Resources  
Bureau of Solid Waste Mgt.  
Box 8094  
Madison, Wisconsin 53708

FOR DNR USE ONLY

Please print or type. Form designed for use on elite (12-pitch) typewriter.

Form Approved. OMB No. 2050-0039. Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. ILD 047019104	Manifest Document No. 7093	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Victor Envelope Mfg. 934 Church Rd. Elmhurst, IL. 60126			A. State Manifest Document Number WI G 07093			
4. Generator's Phone 812, 834-2750			B. State Generator's ID			
5. Transporter 1 Company Name Aurigan Industries, Inc.		6. US EPA ID Number WID 000808824		C. State Transporter's ID 2086		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 608-257-1414		
9. Designated Facility Name and Site Address Aurigan Industries, Inc. 114 N. Main St. Cottage Grove, WI 53527		10. US EPA ID Number WID 000808824		E. State Transporter's ID		
				F. Transporter's Phone		
				G. State Facility's ID		
				H. Facility's Phone (608) 257-1414		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
Waste Flammable Liquid NOS, Flammable Liquid, UN1993		155	DM	15	15 gal	F003
Waste Combustible Liquid NOS, Combustible Liquid, UN1993		455	DM	220	g	F001
Waste Flammable Liquid NOS, Flammable Liquid, UN1993		3	DM	165	g	F005
d.						
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above		
15. Special Handling Instructions and Additional Information 11a) 9629-R-16463 11b) 9631-R-16464 11c) 9630-R-16467						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations and according to the requirements of the Wisconsin Department of Natural Resources. If I am a large quantity generator, I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment;  OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name & Position Title David Nickell Plant Engineer		Signature David Nickell		Date Month Day Year 10/1/88		
17. TRANSPORTER 1 Acknowledgement of Receipt of Materials		Signature Mike Swader		Date Month Day Year 10/1/88		
Printed/Typed Name & Position Title MIKE SWADER DRIVER		Signature		Date		
18. TRANSPORTER 2 Acknowledgement of Receipt of Materials		Signature		Date		
Printed/Typed Name & Position Title		Signature		Date		
19. Discrepancy Indication Space						
20. FACILITY OWNER OR OPERATOR: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name & Position Title		Signature		Date Month Day Year		

FPA Form 8700-22 (Rev. 9-86) Previous editions are obsolete.

Copy Distribution: 1 - Wis. DNR 4 - Facility  
2 - Generator 5 - Generator  
3 - Wis. DNR 6 - Transporter  
Copies 1 & 3 mail to Wis. DNR at above address.

Emergency 24 Hour Assistance Telephone Number  
Wisconsin (608) 266-3232  
Outside Wisconsin (800) 424-8802

COPY 2—  
GENERATOR RETAIN



# NOTIFICATION OF TREATMENT REQUIREMENTS FOR LAND DISPOSAL RESTRICTED WASTE STREAMS

Company Victor Envelope Mfg.

Address 934 Church Rd. Elmhurst, IL

U.S. EPA ID # 10047019104

Manifest # WIG07093

This serves as notification that the above-referenced waste stream is affected by the U.S. EPA Land Disposal Restrictions set forth in 40 CFR 268. The following indicated substances and treatment standards are those applicable to this waste stream.

U.S. EPA Waste Code Numbers

☒ F001 ☐ F002 ☒ F003 ☒ F005

## TREATMENT STANDARDS FOR SPENT SOLVENT WASTES

### F001 - F005 Spent Solvents

Waste Waters Containing Spent Solvents Concentration mg/L	All Other Spent Solvent Waters Concentration mg/L
--	--

<input checked="" type="checkbox"/> Acetone	0.05	0.59
<input checked="" type="checkbox"/> n-Butyl alcohol	5.0	5.0
<input type="checkbox"/> Carbon disulfide	1.05	4.81
<input type="checkbox"/> Carbon tetrachloride	.05	.96
<input type="checkbox"/> Chlorobenzene	.15	.05
<input type="checkbox"/> Cresols (and Cresylic acid)	2.82	.75
<input type="checkbox"/> Cyclohexanone	.125	.75
<input type="checkbox"/> 1,2-Dichlorobenzene	.65	.125
<input checked="" type="checkbox"/> Ethylacetate	.05	.75
<input type="checkbox"/> Ethyl benzene	.05	.053
<input type="checkbox"/> Ethyl ether	.05	.75
<input type="checkbox"/> Isobutanol	5.0	5.0
<input checked="" type="checkbox"/> Methanol	.25	.75
<input type="checkbox"/> Methylene chloride	.20	.96
<input type="checkbox"/> Methylene chloride (from the pharmaceutical industry)	12.7	.96
<input type="checkbox"/> Methyl ethyl ketone	0.05	0.75
<input type="checkbox"/> Methyl isobutyl ketone	0.05	0.33
<input type="checkbox"/> Nitrobenzene	0.66	0.125
<input type="checkbox"/> Pyridine	1.12	0.33
<input checked="" type="checkbox"/> Tetrachloroethylene	0.079	0.05
<input type="checkbox"/> Toluene	1.12	0.33
<input checked="" type="checkbox"/> 1,1,1-Trichloroethane	1.05	.41
<input type="checkbox"/> 1,2,3-Trichloro	1.05	0.96
<input type="checkbox"/> -1,2,2-trifluoroethane		
<input type="checkbox"/> Trichloroethylene	0.062	0.091
<input type="checkbox"/> Trichlorofluoromethane	0.05	0.96
<input type="checkbox"/> Xylene	0.05	0.15

## TREATMENT STANDARDS FOR CALIFORNIA LIST CONSTITUENTS

Constituent	Concentration (mg/L)
<input type="checkbox"/> Cyanides	1000
<input type="checkbox"/> Arsenic	500
<input type="checkbox"/> Cadmium	100
<input type="checkbox"/> Chromium VI	500
<input type="checkbox"/> Lead	500
<input type="checkbox"/> Mercury	20
<input type="checkbox"/> Nickel	134
<input type="checkbox"/> Selenium	100
<input type="checkbox"/> Thallium	130
<input type="checkbox"/> Liquids with pH < 2.0	---
<input type="checkbox"/> Liquids with PCB's	50 ppm
<input type="checkbox"/> Wastes containing HOC's*	
- Liquid containing HOC's	1000 mg/L
- Solid containing HOC's	1000 mg/kg

\* Halogenated organic compounds

\*\* Cyanide and metal concentrations subject to change with issuance of final regulation. See 52 FR 29992, August 12, 1987

The above information is based upon ( ) an attached waste analysis or ☒ generator knowledge of the waste stream(s).

Signed

David Nickell

### GENERATOR INFORMATION

Printed Name

David Nickell

Title

Plant Engineer

Date

10-11-88

29 SEP 1988

5HR-12

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Ken Seroka  
Victor Envelope Company  
934 Church Road  
Elmhurst, Illinois 60126

Notice of Violation  
Victor Envelope Company  
ILD 047 019 104

Dear Mr. Seroka:

On July 14, 1988, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 waste solvents became effective on November 8, 1986, (reference 51 Federal Register 40636: revisions to 40 CFR Parts 260-265, 268, and 270-271) and for "California List" hazardous wastes on July 8, 1987, (reference 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271).

With respect to the land disposal restrictions (40 CFR Part 268) section of the inspection, your facility was found to be in violation of the following:

1. Failure to determine the appropriate treatability group of the waste as required by Section 268.41;
2. Failure to determine whether the waste exceeds treatment standards as required by Section 268.7(a);
3. Failure to provide a separate written notice attached to the manifest for each shipment of F-solvent wastes with the U.S. EPA hazardous waste numbers, the applicable treatment standards, manifest number, and waste analysis data, where available, as required by Section 268.7(a)(1); and
4. Failure to identify contents and mark dates on all containers entering storage, as required by Section 265.50(a)(2)(i).

Mr. Ronald Brown (SHR-12)  
P 250 863 125

**RECEIPT FOR CERTIFIED MAIL**

NO INSURANCE COVERAGE PROVIDED  
NOT FOR INTERNATIONAL MAIL  
(See Reverse)

★ U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Sent to	Mr. Ken Seroka
Street and No.	934 Church Road
P.O., State and ZIP Code	Elmhurst, Illinois
Postage	\$ 1.05
Certified Fee	.85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	.90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 2.80
Postmark or Date	



● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. ☐ Restricted Delivery  
↑(Extra charge)↑ ↑(Extra charge)↑

3. Article Addressed to: Mr. KEN Seroka Victor Envelope Company 934 Church Road Elmhurst, Illinois 60126	4. Article Number P 250 863 125
5. Signature — Addressee X <i>Angie Treibenberg</i>	Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail
6. Signature — Agent X	Always obtain signature of addressee or agent and <b>DATE DELIVERED</b> .
7. Date of Delivery	8. Addressee's Address (ONLY if requested and fee paid)

UNITED STATES POSTAL SERVICE  
OFFICIAL BUSINESS



SENDER INSTRUCTIONS

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE  
USE, \$300

RETURN  
TO



Print Sender's name, address, and ZIP Code in the space below.

*Mr. Ron Brown (5HR-12)*

UNITED STATES OF AMERICA  
ENVIRONMENTAL PROTECTION AGENCY  
230 S. DEARBORN  
CHICAGO IL 60604

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ronald Brown on my staff at (312) 886-4463.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA-CMS  
Glen Savage, IEPA-FOS

	TYP.	AUTH.	IL/IN TECH. ENF. SEC.	MI/WI TECH. ENF. SEC.	OH/MN TECH. ENF. SEC.	IL/MI/WI ENF. PROG. SECTION	IN/MI/ON ENF. PROG. SECTION	RCRA ENF. BR. CHIEF	O.R. A.D.D.	W.M.D DIR
INIT. DATE	SEM	PEB				P.E.D.				
	9/27/88	9-27-88				9.29.88				



RECEIVED  
SEP 7 1988

F.O.S.

OFFICE RCRA LAND DISPOSAL RESTRICTION INSPECTION  
Waste Management Division  
U.S. EPA, REGION V

Facility: VICTOR ENVELOPE CO.  
U.S. EPA I.D. No.: 14D047019104 / 0436355026  
Street: 934 CHURCH RD.  
City: ELMHURST State: IL Zip Code: 60126  
Telephone: 834-2750 (312)  
Operator: VICTOR ENVELOPE CO.  
Street: 934 CHURCH RD.  
City: ELMHURST State: IL Zip Code: 60126  
Telephone: 834-2750 (312)  
Owner: HARLAN BURGESS  
Street: 934 CHURCH RD.  
City: ELMHURST State: IL Zip Code: 60126  
Telephone: 834-2750 (312)  
Inspection Date: 7/14/88 Time: 10:30A - 11:45A Weather Conditions: 100°F SUNNY

	Name	Affiliation	Telephone
Inspectors:	<u>CAROL A. GRASZER</u>	<u>IEPA</u>	<u>345-8780</u>
	<u>CHUCK GRUNTMAN</u>	<u>IEPA</u>	<u>"</u>
	<u>DONNA CZECH</u>	<u>IEPA</u>	<u>"</u>
Facility Representatives:	<u>KEN SEROKA</u>		<u>834-2750</u>
	<u>DAVE NICHOLS</u>		<u>"</u>

	RCRA Status	F-Solvent	LDR Status
			California List
Reduced Requirements Generator	<u>X</u>	<u>X</u>	
Transporter			
Treater			
Storer	<u>G25</u>	<u>X</u>	
Disposer			

RECEIVED

AUG 22 1988

IEPA-DLPC

## INSPECTION SUMMARY

Victor Envelope is a generator subject to reduced requirements who has exceeded 6000 kg. One drum of perchloroethane has been on site for three years according to personnel. That particular container was refused by a transporter because it is in poor condition.

### Violations

1. - the generator did not determine the correct treatability group
2. - they did not determine if the F-solvent wastes exceed treatability standards
  - no waste analysis plan (TSD)
4. - no accumulation date or contents marked on containers
  - no operating records (TSD)
3. - the last shipment of perchlor was 2-15-88, notification was not provided to the TSD facility.
  - Perchloroethane was misclassified as "00001" on the above manifested shipment.

RECEIVED

AUG 22 1988

**RCRA LAND DISPOSAL RESTRICTION INSPECTION  
APPLICABILITY CHECKLIST**

Does the facility handle the following wastes?

	Gen.	Treat	Store	Disp.	Trans.
<b>A. <u>F-Solvent Wastes</u></b>					
1. F001	_____	_____	_____	_____	_____
2. F002	_____✓_____	_____	_____✓_____	_____	_____
3. F003	_____	_____	_____	_____	_____
4. F004	_____	_____	_____	_____	_____
5. F005	_____	_____	_____	_____	_____

**Note:** Use Appendix A to determine whether the facility is misclassifying any of its wastes.

**B. California List Wastes**

NA

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	_____	_____	_____	_____	_____
Cadmium	100 mg/L	_____	_____	_____	_____	_____
Chromium VI	500 mg/L	_____	_____	_____	_____	_____
Lead	500 mg/L	_____	_____	_____	_____	_____
Mercury	20 mg/L	_____	_____	_____	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

RECEIVED

AUG 22 1988

IEPA-DLPC

NA

APP

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	_____	_____	_____	_____
500 ppm	_____	_____	_____	_____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, state reasons for mixing:

\_\_\_\_\_  
\_\_\_\_\_

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

RECEIVED  
AUG 22 1988  
IEPA-DLPC



## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

\_\_\_\_ Yes X No \_\_\_\_ NA

If yes, check the appropriate treatability group.

- \_\_\_\_ Wastewaters containing solvents (less than or equal to 1% TOC by weight)  
\_\_\_\_ Pharmaceutical wastewater containing  
✓ spent methylene chloride  
\_\_\_\_ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

NA

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

\_\_\_\_ Yes \_\_\_\_ No \_\_\_\_ NA

If yes, specify the method: \_\_\_\_\_

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

\_\_\_\_ Yes \_\_\_\_ No \_\_\_\_ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

RECEIVED

AUG 22 1988

IEPA-DLPC



**B. Waste Analysis****1. F-Solvent Wastes**

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

\_\_\_\_\_ Yes   X   No \_\_\_\_\_ NA

How was this determination made?

- Knowledge of waste

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, note how this is adequate: \_\_\_\_\_

- TCLP

\_\_\_\_\_ Yes   ✓   No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

  ✓   Yes \_\_\_\_\_ No \_\_\_\_\_ NA

If yes, specify the waste stream:

spent perchlor

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

\_\_\_\_\_ Yes   ✓   No \_\_\_\_\_ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

upon disposal

**2. California List Wastes**

NA

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

RECEIVED

AUG 22 1988

IEPA-DLPC

GEN

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

\_\_\_\_ Yes \_\_\_\_ No \_\_\_\_ NA

What type of absorbent is used? \_\_\_\_\_  
Check the types of waste to which absorbent is added.

\_\_\_\_ Liquid hazardous waste having a pH less than or equal to 2

\_\_\_\_ Liquid hazardous waste containing HOCs in concentrations greater than or equal to 1,000 mg/L, but less than 10,000 mg/L

\_\_\_\_ Liquid hazardous waste containing metals

\_\_\_\_ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

\_\_\_\_ Yes \_\_\_\_ No \_\_\_\_ NA

If yes, note how this is adequate: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- Testing

\_\_\_\_ Yes \_\_\_\_ No \_\_\_\_ NA

If yes, list test method used: \_\_\_\_\_  
\_\_\_\_\_

- d. Does the generator determine if concentration levels in PFLT extract exceed cyanide and metals concentration levels?

\_\_\_\_ Yes \_\_\_\_ No \_\_\_\_ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

\_\_\_\_ Yes \_\_\_\_ No \_\_\_\_ NA

NA



RECEIVED

AUG 22 1988

IEPA-DLPC

C. Management

1. On-Site Management

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes ☐ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes ☐ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☐ Yes ☒ No

last shipment  
on 2-15-88

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Identify off-site treatment or storage facilities:

ANGLIC IN WISCONSIN

b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☐ Yes ☒ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

RECEIVED

AUG 22 1988

IEPA-DLPC

GEN

If yes, does notification contain the following?

NA

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site land disposal facilities:

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

☐ Yes ☐ No ☒ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes  
(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

☐ Yes ☒ No

If yes, list types of waste treatment units and processes:

RECEIVED

AUG 22 1988

IEPA-DLPC



## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

## TSD REQUIREMENTS

A. General Facility Standards

No WASTE ANALYSIS PLAN

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☐ Yes ☒ No ☐ NA

o California List ☐ Yes ☐ No ☒ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☒ Yes ☐ No

- a. What date was the waste analysis plan last revised? \_\_\_\_\_

- b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: CBC ENVIRONMENTAL SVCS  
140 E. RYAN RD. OAK CREEK, WI 53154

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☒ No ☐ NA

- d. Describe the frequency of sampling: 7-1-88 was the only  
analysis available

- e. Describe procedures used to identify manifest discrepancies:

NA

RECEIVED

AUG 22 1988

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☐ Yes ☒ No operating record

IEPA-DLPC



B. Storage (268.50)

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

☒ Containers ☐ Tanks

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☐ Yes ☒ No ☐ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☐ Yes ☒ No NO OPERATING RECORDS

5. Do operating records agree with container labeling?

☐ Yes ☐ No ☒ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

☒ Yes ☐ No ☐ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

☒ Probably ☐ No ONLY 8 DRUMS ON SITE

If yes, state how: FACILITY IS A GENERATOR SUBJECT TO REDUCED REQUIREMENTS

RECEIVED

AUG 22 1988

IEPA-DLPC

Revised 11-03-87

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

\_\_\_\_ Yes      \_\_\_\_ No      ☒ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

\_\_\_\_ Yes      \_\_\_\_ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

\_\_\_\_ Yes      \_\_\_\_ No      \_\_\_\_ NA

C. Treatment

NO TREATMENT

1. Does the facility treat restricted wastes other than in surface impoundments?

\_\_\_\_ Yes      \_\_\_\_ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

\_\_\_\_ Yes      \_\_\_\_ No

4. Describe frequency of testing treatment residuals:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. Is dilution used as a substitute for treatment?

\_\_\_\_ Yes      \_\_\_\_ No

RECEIVED

AUG 22 1988

IEPA-DLPC

6. Are notifications prepared by the generators kept in the facility's operating record? ☐ Yes ☐ No
7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility? ☐ Yes ☐ No ☐ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

☐ Yes ☐ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Applicable treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Waste analysis data, if available	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Certification that the waste meets the treatment standards	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Identify off-site disposal facilities: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**D. Treatment in Surface Impoundments**

1. Are restricted wastes placed in surface impoundments for treatment?

☐ Yes ☐ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

☐ Yes ☐ No

RECEIVED

APR 22 1988

IEPA-DLPC

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Provide the frequency of analyses conducted on treatment residues: \_\_\_\_\_

\_\_\_\_\_

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

8. Are the hazardous waste residues that exceed the treatment standards (268.41) removed adequately and on an annual basis?

Sludge      \_\_\_\_\_ Yes      \_\_\_\_\_ No

Supernatant      \_\_\_\_\_ Yes      \_\_\_\_\_ No

- a. If no, and supernatant is determined to exceed treatment concentrations, is annual volume of liquid flowing through the impoundment greater than the impoundment volume?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

- b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

RECEIVED

AUG 22 1988

IEPA-DLPC



- c. Are residues subsequently managed in another surface impoundment? ☐ Yes ☐ No

- d. Are residues treated prior to disposal? ☐ Yes ☐ No

If yes, are waste residues treated on-site or off-site?

☐ On-site ☐ Off-site

Identify treatment method: \_\_\_\_\_

#### E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker? ☐ Yes ☒ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: \_\_\_\_\_

2. Does the facility operating record have notices and certifications from generators/storer/treaters [268.7(c); 268.7(a),(b)]? ☐ Yes ☒ No

RECEIVED

AUG 22 1988

3. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]? ☐ Yes ☐ No

EPA-DLPC

If yes, at what frequency? ADD WASTE ANALYSIS PLAN

TSD

4. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

\_\_\_\_ Yes      \_\_\_\_ No NA

5. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

\_\_\_\_ Yes      \_\_\_\_ No

If yes, are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection)?

\_\_\_\_ Yes      \_\_\_\_ No

6. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

\_\_\_\_ Yes      \_\_\_\_ No      \_\_\_\_ NA

7. What is the volume of the restricted wastes disposed of to date?

\_\_\_\_\_  
\_\_\_\_\_

8. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

\_\_\_\_ Yes      \_\_\_\_ No      \_\_\_\_ NA

RECEIVED

AUG 22 1988

IEPA-DLPC

Wastes shipped to:

TSD NAME LOCATION EPA ID NO.	TYPE OF FACILITY T/D METHODS	WASTE CODE	WASTE QUANTITY	COMMENTS (shipment dates, waste descriptions, etc.)
Arganic Industries Cottage Grove Wisconsin WID 00080 8824	Reclamation	F002	60 gal	2-18-88

RECEIVED  
AUG 22 1988  
IEP-DLPC







UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

MEMORANDUM

**DATE:** July 15<sup>th</sup>, 2009  
**SUBJECT:** Determination of Need for an Investigation  
Facility Name: Victor Envelope Mfg Corp. Inc.  
EPA ID #: ILD 047 019 104  
**FROM:** Amanda Damptz  
**TO:** George Hamper

☒ **CA070NO** Determination of Need for an Investigation-Investigation is not Necessary

Reason for Determination

- ☐ Preliminary Assessment/Visual Site Inspection (PA/VSI) did not recommend any further investigation
- ☐ PA/VSI recommendations do not warrant RRB attention
- ☐ Phase 1 Environmental Site Assessment (ESA) did not recommend further investigation
- ☐ Phase 2 ESA did not recommend further investigation
- ☐ Phase 1/Phase 2 ESA recommendations do not warrant RRB attention
- ☒ Company representative asserts that the site is clean
- ☐ Not subject to corrective action
- ☐ Enrolled in other clean-up program
- ☐ Superfund No Further Action Decision
- ☐ PA/VSI recommendations have been implemented
- ☐ Removal
- ☐ Site Remediation Program
- ☐ Site Remediation Program No Further Remediation letter was issued
- ☐ Superfund
- ☐ Superfund No Further Action Decision
- ☐ Superfund Base relocation Closure
- ☐ Voluntary Remediation Program
- ☐ Other

☐ **CA070YE** Determination of Need for an Investigation – Investigation is Necessary

Reason for Determination

- ☐ PA/VSI recommends further investigation
- ☐ ESA recommends further investigation
- ☐ Other

☐ **No determination can be made – More Information Needed**

☐ Approved

☐ Not Approved

Signed: Amanda Damptz

Date: 7/15/09

Signed: George Hamper

Date: SEP 30 2009

**Determination Date:** Company representative asserts that the site is clean.  
**Determination:** July 8, 2009

### Facility Contact Form (No PA/VSI)

Facility Name: Victor Envelope MFG Corp. INC

EPA ID#: ILD 047 019 104 Address: 934 Church Rd.

City: Elmhurst State: IL

Units Closed: SO1 Date: August 28<sup>th</sup> 1989

Facility Representative: Ken Scroka (CEO) Phone# 630-616-2750

Email Address: \_\_\_\_\_

Date of phone conversation: July 8, 2009

Ken Scroka (CEO) indicated that the property on 934 Church Rd Elmhurst was the main building but is now being subleased out by the company to Design Centrix (which builds trade show booths. The only materials associated in the process are wood and metal. 5 employees are in the building and it is mainly used for storage)

SO1 - The 55 gal drum of concern was used to hold ink waste and was stored in a separate room from operations on a concrete slab. During an EPA inspection the drum was not properly labeled.

Victor Envelope Company  
301 Arthur Court  
Bensenville, IL 60106  
630.616.2750  
Victorenvelope.com

Y / ☒ Is there known soil or groundwater contamination?  
Contaminants:

Y / ☒ Has the parcel been split or was there a change in ownership?

Y / ☒ / ? Was a Phase 1 or Phase 2 report prepared in connection with a sale of the property?  
Y / N Can we have a copy?

Y / ☒ Is the facility currently operating? Facility is currently being subleased out to other companies not associated with Victor Envelopes.

- When was the plant built? \_\_\_\_ 1976 \_\_\_\_
- What products are/were made?  
Envelopes
- What chemicals were used in the process?
  - Ingredients: Printing inks
  - Solvents for cleaning products:
  - Solvents for degreasing machinery: NO
  - Fuels (coal/gasoline/fuel oil):
- Y / N Are there any known spills from electrical equipment containing PCBs?  
Y / N Have spills always been cleaned up properly?
- What kinds of solid wastes were produced?  
Paper and at one point in time Ink waste
- How were solid wastes managed?
  - Y / N Waste piles      Quantity: \_\_\_\_  
Containing:
  - Y / N On-site landfill      Quantity: \_\_\_\_  
Containing:
- How were liquid wastes (such as solvents) managed?
  - Y / N Drums  
Containing:
  - Y / N Above-ground tanks      Quantity: \_\_\_\_  
Containing:
  - Y / N Underground tanks      Quantity: \_\_\_\_ How long have they been in use? \_\_\_\_  
What are they made out of: Steel / Cement / Other: \_\_\_\_  
Any known leaks:
  - Y / N Underground pipes  
Containing:
- How were wastewaters managed?
  - Y / N Tanks
  - Y / N Pits, ponds, or lagoons (surface impoundments)